Arkansas Steel Associates, LLC

ASA

2803 Van Dyke Road
Newport, Arkansas 72112
U.S.A.
Tel. No. (870) 523-3693
Fax. No. (870) 523-4619

January 3, 2011

Environmental Protection Agency
Office of Federal Activities
International Compliance Assurance Division (2254A)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

ATTENTION: Hazardous Waste Exports

Gentlemen:

The purpose of this letter is to comply with 40 CFR 262.56 and 262.87(a) Annual Reporting, and offer the following information as requested:

Exporter	1)	Arkansas Steel Associates, L.L.C. Facility ID# ARD091691261 2803 Van Dyke Road Newport, Arkansas 72112
Calendar Year	2)	Calendar year covered by this report, 2010
Foreign Consignee	3)	Zinc Nacional, S.A. Serafin Pena Sur 938 Monterrey N.L. Mexico 64000
Waste Description	4)	Flue dust, Iron or Steel containing Recoverable zinc. EPA Hazardous Waste Code K-061 DOT Hazard Class ORM-E UN 3077, Class 9, PGIII, ERG #171, U.S. EPA ID# of transporter, NED001792910, (U.P. Railroad). Total amount of waste shipped in 2010 6,759,200 lbs. and total number of shipments were 41.
Toxicity Volume	5)	Toxicity has not changed as compared to previous years. 2007 average zinc content was 23.3%. 2008 average zinc content was 20.72%. 2009 average zinc content was 16.86%. 2010 average zinc content was 20.73%.

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"HAZARDOUS WASTE EXPORTS"

Toxicity

These slight changes occur due to variations in the scrap (raw material) mix in the melting process of steel.

Volume

Volume has decreased by 724,720 lbs. in 2010, as compared to 2009, K-061 flue dust is generated through the normal production process of steel in electric arc furnaces and controlled solely by production demands of steel facilities products.

No efforts were undertaken to reduce the volume of toxicity as there is no technology currently known to achieve this; however, recycling the material has been chosen as the most environmentally sound method available to Arkansas Steel Associates, L.L.C.

Certification

6) I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information, is true and accurate, and complete. I am aware that there are significant penalties for submitting false information including possibility of fine and imprisonment.

Sincerely,

Billy E. Ferguson
Manager, Environment

Toshinori Nakinishi
President

cc: Ar. Dept. of Environmental Quality
Hazardous Waste Division
5301 Northshore Drive
North Little Rock, AR 72118-5317

Toshinori Nakinishi
President, A.S.A., L.L.C.